Finding of No Significant Impact
Redwood National Park and
Green Diamond Resource Company
Rights-of-Way Exchange

Redwood National Park
Humboldt County, California

December 2008

Introduction
This Finding of No Significant Impact (FONSI) should be attached to the *Redwood National Park and Green Diamond Resource Company Rights-of-Way Exchange Environmental Assessment* (EA) dated September 2008, so as to constitute a full and complete record of the conservation planning and environmental impact analysis process for conveying permanent rights-of-way (ROWs) to Green Diamond Resource Company (GDRCo) to use of certain existing roads in Redwood National Park in exchange for National Park Service (NPS) use of certain existing roads on Green Diamond Resource Company lands.

Purpose and Need for Rights-of-Way Exchange
The NPS and GDRCo have allowed the reciprocal use of certain roads since 1983 through special use permits or general agreements. Neither special use permits nor general agreements are adequate instruments because of the perpetual need of both parties for use of the roads for management of resources. Rights-of-way conveyed through deeded easements are needed to ensure continued access for each party for management of respective lands in perpetuity.

The purpose of the ROW exchange is to provide the shortest route to lands owned by each party using existing roads, thereby avoiding construction of new road systems. Construction of new roads would result in adverse effects to natural and cultural resources and in increased travel, construction and maintenance costs to both the NPS and GDRCo.

Selected Action and Alternatives
The September 2008 EA identified and analyzed a no action alternative (Alternative 1) and two action alternatives: Alternative 2: Exchange of Rights-of-way (the selected action and the environmentally preferred alternative), and Alternative 3: Construct Roads.

The approved action to be implemented is the same as that described and analyzed in the EA as the proposed action (Alternative 2: Exchange of Rights-of-way). There are no changes in the approved action, mitigations, or other key elements as a result of public comment.

Under the approved action, the National Park Service will convey permanent rights-of-ways (deeded easements) to GDRCo for use of about 1.2 miles of existing roads across lands in Redwood National Park in exchange for conveyance of permanent ROWs to the NPS for use of about 22 miles of existing roads owned by GDRCo on lands adjacent to the park. The conveyance of 1.2 miles of ROWs to GDRCo will not result in any changes in GDRCo's timber harvest program, and the conveyance of 22 miles of ROWs to the NPS will not result in any adverse effects to NPS operations in Redwood National Park. There will be a beneficial effect to the NPS from more efficient operations under the selected action. Of the 22 miles of GDRCo roads that will be used by the NPS, 5.8 miles will be used regularly for routine park management operations. The other 16.1 miles of GDRCo roads will be used only occasionally as needed by the NPS for direct transport of large earthmoving equipment and personnel from U.S. Highway 101 into the park for watershed restoration projects. GDRCo will use the 1.2 miles of park roads on a regular basis for access to manage its timberlands. GDRCo's use of park roads will be limited to the existing road corridor; park roads will not be widened or paved. GDRCo will be responsible for the routine maintenance and repair of all roads covered in the exchange, including maintenance and repair of road surfaces, drainage systems and structures, and vegetation management. Vegetation management will be limited to manual or mechanized removal of brush and low tree limbs that interfere with safe vehicle access.

Under the no action alternative (Alternative 1 in the EA), both the NPS and GDRCo would continue to use each other's roads for access to respective NPS and GDRCo lands under a reciprocal road use agreement. The roads covered by the reciprocal road use agreement are the same roads for which permanent ROWs will be exchanged under the selected action. The road agreement will expire in less than three years. Successive renewals of a general agreement are not considered to be a long-term solution for either the NPS or GDRCo because of the perpetual needs of each party for access to their respective lands, as demonstrated over the last 25 years (since 1983). The purpose and need for the project is to provide a long-term solution for access to each party's respective lands. The no action alternative was not selected because it does not meet the purpose and need for the project.

Under Alternative 3: Construct Roads, the NPS and GDRCo would terminate the general agreement for use of roads owned by the other party. GDRCo would construct a new road system to access its lands in the Klamath River watershed. On the west side of the Redwood Creek watershed south of Rodgers Peak, the NPS would build 2.5 miles of new roads, upgrade 1.0 mile of existing roads, and rebuild 2.6 miles of roads previously removed under the park watershed restoration program. This would require construction of about 23 stream crossings, excavation of more than 125,000 cubic yards of soil, and clearing of about 25 acres of second-growth forest. GDRCo would construct or upgrade about 40 miles of roads that would require construction of about 144 stream crossings, excavation of about 380,000 cubic yards, and clearing about 125 acres of second growth forest. This alternative was not selected because the purpose of the project is to reduce the adverse effects on park resources from constructing new roads and because constructing new roads in the park is inconsistent with the legislative mandate to restore

park watersheds damaged by road construction for timber harvest prior to the establishment and expansion of Redwood National Park.

Environmentally Preferred Alternative

The environmentally preferred alternative is the action that best promotes the environmental policies outlined in the NEPA statute. These policies include fulfilling the responsibilities of each generation as trustee of the environment for succeeding generations; attaining the widest range of beneficial uses of the environment without degradation, risk to health or safety, or other undesirable and unintended consequences; and preserving important historic, cultural, and natural aspects of our national heritage.

The EA identified Alternative 2 (the selected action) as the environmentally preferred alternative. Under the selected action, all activities will occur in existing road corridors in previously disturbed soils. The selected action will require no new ground disturbance. Vegetation along the road corridors has been previously disturbed primarily by clearcut logging with some disturbance in the Bald Hills related to agriculture and ranching. Vegetation management within the park corridors will be limited to the removal of overhanging tree limbs that interfere with vehicle passage.

The no action alternative differs from the selected action in the type of legal instrument used to permit reciprocal use of roads by each party. The roads that will be included in the conveyance of ROWs under the selected action are the same roads that are currently covered by the general agreement for reciprocal road use. There is no difference in potential effects on resources between the no action alternative and the selected action. However, the no action alternative does not provide management stability needed by the NPS because general use agreements are short-term instruments that do not allow perpetual use of roads needed for long-term management of park and GDRCo lands. The no action alternative would not achieve the goal of the NEPA statute to fulfill the responsibilities of this generation as trustee of the environment for succeeding generations. Therefore, the no action alternative is not the environmentally preferred alternative.

Alternative 3 is not the environmentally preferred alternative because soils, streams, and second-growth forest would be adversely affected to construct, reconstruct, or upgrade about 6 miles of road in the park and 40 miles on GDRCo lands adjacent to the park. About 23 stream crossings would be built in the park and about 144 stream crossings would be built on GDRCo lands. More than 125,000 cubic yards of soil would be excavated in the park and nearly 380,000 cubic yards on GDRCo lands. About 25 acres of second-growth forest would be cleared to build the new road system in the park. On GDRCo lands, about 45 acres of second-growth forest would be cleared for new road construction within a 60-foot-wide corridor and about 80 acres cleared in a 20-foot-wide corridor to upgrade other roads. These impacts would affect GDRCo lands and degrade park resources, including soils, streams and forests that have begun to recover after being damaged by clearcut logging and road construction. Road-related erosion and sedimentation is identified in the 1978 park expansion legislation and the 1999 environmental impact statement for the park's General Management Plan as a threat to the aquatic and riparian resources of the park. Even though new roads would be constructed and maintained to current standards, constructing additional roads within the

national park would not meet the long-term trustee responsibilities of the NPS and would further degrade park lands rather than reducing the existing level of degradation.

Public Involvement and Agency Coordination
The NPS sent scoping letters to 51 federal, state, and local officials, agencies, organizations, and individuals and to seven American Indian governments in October 2006 soliciting comments on the proposed ROW exchange. The NPS received no responses to these letters. Two environmental organizations were informed of the proposal via electronic mail and responded that they had no substantive concerns on the scoping proposal.

The EA was available for public review and comment for a period of 45 days, from September 30 through November 14, 2008. The opportunity for public review and comment on the EA was announced via news releases sent to five local newspapers and other local media on the park's standard list of media contacts, none of which published or provided notification of the availability of the EA. The EA was available for review at four local libraries and on the park website. Copies of the EA were sent to 40 federal, state, and local officials, agencies, organizations, businesses, and individuals. Eight American Indian governments received copies of the EA. Letters summarizing the proposed project, announcing the availability of the EA for review, and inviting comments were sent to 12 businesses and organizations and 15 individuals.

The NPS received one comment via electronic mail and one hand-delivered written comment that supported the selected action. There were no substantive comments on the EA, nor any comments that required any changes to the EA.

Regulatory Agency Consultations
Federal Endangered Species Consultations—The NPS met with U.S. Fish and Wildlife Service (USFWS) and National Marine Fisheries Service (NMFS) staff in Arcata, California on September 20, 2006. Both the USFWS and NMFS agreed that the proposed exchange of rights-of-way on existing roads does not have the potential to directly affect any species listed or proposed for listing under the Endangered Species Act of 1973, as amended (ESA; 16 U.S.C. 1521 *et seq.*). Further, timber harvest is occurring and will occur regardless of whether the NPS grants rights-of-way to GDRCo, so that timber harvest is neither interdependent upon nor interrelated to the proposed NPS action.

The USFWS further agreed in the September 20, 2006 meeting that indirect effects, i.e. those reasonably expected to occur and that are later in time (timber harvest), on northern spotted owls from the proposed ROW exchange have been adequately evaluated and considered in the 1992 Simpson Timber Company *Habitat Conservation Plan for the Northern Spotted Owl* (HCP) and the accompanying environmental assessment prepared by the USFWS. GDRCo was authorized incidental take of northern spotted owls by USFWS under Section 10(a) of the Endangered Species Act. The GDRCo conservation strategy for protecting northern spotted owls under the HCP sets aside 13,200 acres of no harvest area, maintains a 20,000-acre special management area, and accelerates the regrowth of owl habitat. Under an amendment to the HCP, GDRCo has also initiated

research on the interaction between the northern spotted owl and the barred owl; the NPS is participating in this research.

NMFS agreed that consultation on the proposed ROW exchange is not warranted because while there may be indirect effects on coho salmon or other listed fish from future timber harvest outside the project area, timber harvest is neither interdependent upon nor interrelated to the proposed exchange of rights-of-way and that effects on listed fish are addressed by the 2006 GDRCo Aquatic Habitat Conservation Plan (AHCP) and accompanying environmental impact statement prepared by USFWS and NMFS. The Final Environmental Impact Statement for the AHCP was approved on June 12, 2007. The AHCP includes required mitigation measures and terms and conditions for operations to avoid or reduce adverse effects on federally listed threatened and endangered species. The conservation strategy for protecting aquatic species includes, among other things, protective measures for unstable areas and streamside harvesting, and road improvement schedules for the entire GDRCo ownership. The incidental take and enhancement of survival permits issued by the USFWS and NMFS under Section 10(a) of the Endangered Species Act became effective on July 1, 2007.

The NPS has completed consultations with both the USFWS and NMFS for effects on listed species from use and maintenance of park roads annual and periodic road maintenance (NMFS biological opinion and letter of concurrence 151422SWR02AR6347, March 2003). Therefore, the NPS did not consult separately on the proposed action under Section 7 of the ESA for effects on listed species from use and maintenance of park roads.

State Consultations and THP Review—The NPS is required to assess the potential effects of its actions under the implementing regulations of the National Environmental Policy Act (NEPA). The September 2008 EA complied with all applicable NPS policies and guidelines for implementing NEPA. The exchange of ROWs for use of roads on federal or private lands does not require a state permit and is not subject to the California Environmental Quality Act (CEQA), although GDRCo timber harvest planning and operations are subject to CEQA. Timber Harvest Plans (THPs) or other operational permits required by state laws will be prepared or acquired by GDRCo pursuant to the applicable requirements of CEQA. A THP substitutes for environmental impact reports required under CEQA (PRC §21080.5).

GDRCo conducts timber harvest operations under state Forest Practice Rules (FPRs) that regulate timber harvest activities. GDRCo is also subject to state environmental laws, regulations and policies for protection of water quality, fish and wildlife (including state-listed endangered species), and cultural resources. The FPRs require that GDRCo prepare THPs for approval by the California Department of Forestry and Fire Protection (CalFire).

Cultural Resource Consultations

The NPS consulted on the selected action with the California State Historic Preservation Officer (SHPO) under Section 106 of the National Historic Preservation Act and under the 1995 Programmatic Agreement Among the NPS, the Advisory Council on Historic

Preservation, and the National Conference of State Historic Preservation Officers. The SHPO concurred in a letter dated August 13, 2007 with the NPS determination that the proposed undertaking will not have an adverse effect on historic properties because the roads will only be maintained and no other impacts are expected (SHPO project NPS070626A).

Prior consultation has occurred between the NPS and California SHPO regarding two access points addressed in the selected action. Correspondence between NPS and the California SHPO dated October 2003 sought concurrence with preliminary findings and recommendations for providing GDRCo access points at the T530 and the T500 road intersections with Bald Hills Road and at Rodgers Peak. The SHPO concurred with this determination in November 2003 provisioned on conditions outlined by the NPS for protection of archeological site CA-HUM-669 (SHPO Project NPS031008).

In addition, letters of consultation were sent to the Yurok Tribe, Hoopa Valley Tribe, Resighini Rancheria, Big Lagoon Rancheria, Trinidad Rancheria, Tolowa Nation, Elk Valley Rancheria, and Smith River Rancheria in October 2006. No comments were received.

Why This Project Will Not Have a Significant Effect on the Environment
This section summarizes foreseeable effects on park resources in the context of the project area, RNSP as a whole, and adjacent GDRCo lands, and documents that none of these effects is significant, highly controversial or uncertain, nor will the selected action adversely affect public health and safety.

Regular use of the park roads by GDRCo will not lead to indirect effects on the park, or in watersheds in which GDRCo operates, other than those indirect effects on natural resources that were described in the final environmental impact statements for the GDRCo HCP/AHCP, or in THPs required for timber harvest. Mitigation measures to protect federally- and state-listed species are described in AHCP, HCP, and subsequent THPs. Potential effects to other resources are also discussed but have been determined to be negligible or minor and will not require mitigation to avoid or reduce the effects that are specific to this project.

The effects of the no action alternative are the same as the effects of the selected action because the roads for which rights-of-way, and the use and maintenance of those roads, will be conveyed under the selected action are the same roads and will have the same uses as under the no action alternative.

Air Quality—Use and maintenance of unpaved roads under the selected action and the no action alternative will have negligible, short-term adverse effects on air quality from vehicle emissions and fugitive dust from exposed soils. Dust suppression equipment and clean water will be used to reduce excess airborne particulates from exposed soils when roads area used for hauling.

Construction and use of 40 miles of newly constructed and upgraded roads on GDRCo lands for harvest operations under the Alternative 3 would result in more dust and vehicle

emissions than would use of the existing 1.2 miles of road across park lands. These effects would be adverse, short-term but repeated occasionally during the long-term, and negligible.

Cumulative Effects on Air Quality—Air quality in the parks and the region will continue to be very good to excellent over the long-term. The only potentially significant source of air pollution is from wildfires, which have significant adverse effects on air quality for the duration of the fire. Planned fire ignitions have negligible to moderate short-term adverse effects and no long-term adverse effects. The North Coast Air Quality Management District coordinates planned ignitions in Humboldt, Del Norte, and Trinity Counties to minimize cumulative adverse smoke effects on sensitive areas, primarily local communities and highways. The cumulative effect on air quality in the parks from prescribed fires conducted on adjacent private timberlands to reduce logging slash will be short-term, adverse, localized and could range from negligible to moderate depending on wind conditions and how close the prescribed fires are to park boundaries.

Effects on Geology, Geological Hazards, and Soils—The purpose of the proposed action is to use existing roads to avoid additional effects on soils and topography from construction of new roads. All soils affected by the selected action or the no action alternative have been previously disturbed for logging and road construction. The selected action will have a negligible long-term adverse effect on soils, no effect on geological resources, and no effects associated with geological hazards.

Constructing or rebuilding six miles of roads on park lands would require grading, excavation, and other earthmoving activities affecting about 125,000 cubic yards of soils on about 23 acres previously disturbed by timber harvest. Approximately 380,000 cubic yards on about 127 acres would be disturbed for construction or rebuilding of 40 miles of roads on GDRCo lands.
The effects on soils and topography are the same under both the no action alternative and the proposed action. There would be no new effects on topography from use and maintenance of the existing roads. The roads off the Bald Hills are located on the ridgetop with negligible changes to the original topography from cut and fill. The overall effect on soils and topography under either the no action alternative or the proposed action would be long-term, localized within the road corridors, adverse, and negligible.

The overall effect on soils in the parks under this alternative would be adverse, long-term, and minor due to the previous disturbance of the soils from past logging and in comparison to widespread damage to soils from previous unregulated road construction and logging techniques. The overall effect on topography in the park would be adverse, long-term and minor compared to the widespread alteration of topography from earlier logging. Within the project area in the park where the road would be constructed under Alternative 3, the overall adverse effect on soils and topography would be moderate because of the alteration of the natural topography on which portions of the road would be constructed.

Cumulative Effects on Geology, Geological Hazards, and Soils–The purpose of the proposed action is to use existing roads to avoid additional effects on soils and

topography from construction of new roads. Many of the past logging and road construction practices that severely altered topography or that resulted in loss of topsoil and soil productivity are prohibited by current FPRs under which GDRCo operates. Under current regulations, impacts on geologic features would generally be avoided by moving the road to the most stable location or through engineering designs to provide long-term stability. There is some earthmoving for road construction associated with timber harvest on GDRCo lands outside the project area but substantial alterations to topography are prohibited under current regulations.

Cumulative effects on soils in the project area are primarily the result of past logging of old growth forest and the construction of truck roads, skid roads, and landings under old forest practice rules that did not require the level of resource protection of current rules. Current logging outside the park also affects soils and topography but the effects are minor compared to the significant adverse effects of the original logging practices.

The reuse of existing skid roads, in combination with the soil stabilization measures required under current FPRs, the proper waterbar placement prior to completion of operations, cable yarding and shovel yarding, and the amount of residual vegetation and/or logging slash and debris retained after logging to reduce erosion and sediment production would minimize the amount of potential erosion within harvest areas.

Effects on Hydrology and Water Quality—Use and maintenance of existing roads will not have new effects on hydrology or drainage patterns.

The project area roads are located on ridges and are upslope of intermittent or perennial stream channels and will not affect hydrology of the project area. There will be negligible to minor surface erosion of fine sediment from the project area roads from use and maintenance that loosens dirt on the road surface. The quantities that will be delivered to streams will be negligible to minor because of the distance between the roads and streams. Therefore, impacts to hydrology or water quality will be negligible from use of project area roads under either the no action or the selected action.

There will be no direct effects on hydrology or water quality in Redwood Creek or the Klamath River under either the no action alternative or the selected action because the existing roads occupy ridgetop locations and park roads do not cross intermittent or perennial streams. Direct adverse effects on water quality in Redwood Creek, the Klamath River, and some tributaries in the project area from sedimentation from past logging and road construction practices will continue. These are long-term effects that have been on-going since original timber harvest practices that began in the 1950s and continued through the enactment of the current state FPRs and state regulations to implement the federal Clean Water Act and enforce state water quality standards. Adverse effects of water quality (temperature, turbidity) range from negligible to significant depending on the reach of stream and the time of year, with good water quality in shaded tributaries during low flow periods to significant turbidity and mobilized sediment during flood flows.

Long-term indirect adverse effects to hydrology and water quality on GDRCo lands from sediment will be minimized by compliance with FPRs; by use of existing roads to minimize construction of new roads; by enforcement of the GDRCo road construction and maintenance program; by improvements to existing drainage and stream crossing structures; and by voluntarily striving to meet Redwood Creek TMDL hillslope targets. Long-term adverse effects on water quality and hydrology in the park will be lessened by replacement of old or failing culverts at stream crossings with larger culverts sized to accommodate 100-year storm events, and by removal of roads and restoration of original landforms through the Watershed Restoration Program.

Under Alternative 3, construction of new roads and rebuilding previously removed roads in the park would have short-term adverse effects on water quality during the first few seasons following construction, and long-term adverse effects after the initial flush of newly excavated sediment. These effects are expected to be negligible because of modern construction techniques and maintenance of the new roads.

Cumulative Effects on Water Quality— Redwood Creek has been designated as sediment- impaired under Section 303(d) of the Clean Water Act; the impairment results primarily from past logging practices. The hydrology and water quality in the Klamath River have also been adversely affected by past logging practices, dams for hydroelectric power and irrigation, and agricultural uses in northeastern California and southern Oregon. These latter factors are also linked to the listing of the Klamath River for temperature impairment under Section 303(d) of the Clean Water Act.

Sediment inputs into Redwood Creek upstream of the park and in the Klamath River from current and future timber harvest operations will be minimized by practices including use of existing truck roads and skid roads to the greatest extent practicable; upgrading existing stream crossings; establishing wildlife or stream protection zones; falling timber away from streams; use if temporary road construction techniques that minimize soil disturbance and alteration of the topography; and implement soil stabilization measures.

Over the very long-term, water quality in Redwood Creek and tributary streams is expected to improve as old roads are removed in and upstream of the park, and old roads are maintained to modern standards. Hydrological systems of park watersheds are also expected to improve over the long-term as stream crossings and topography are restored under the watershed restoration program.

Effects on Floodplains and Wetlands—There will be no direct effects on floodplains or riparian wetlands under either the no action alternative or the selected action. There might be temporary direct adverse effects to isolated wetlands from replacement of improperly functioning culverts or improvements to drainage ditches in very small isolated wetlands that form from nonfunctioning drainage structures outside the project area but these short-term adverse effects are needed to restore proper drainage. The isolated wetlands have negligible functions and values compared to natural wetlands.

Direct adverse effects on small areas of riparian wetlands would result from road construction at individual stream crossings under Alternative 3 from installation of culverts in intermittent streams in the headwaters of Bridge Creek and Devils Creek. The total area of riparian wetland affected by construction of the 23 stream crossings would be 2.1 acres of non-contiguous riparian wetlands that were previously affected by logging, road building, and road removal. Construction would take place when streams are dry so there would be no direct short-term adverse effects on wetland values from construction. The functions of riparian wetlands downslope of the project area would be protected by installation of drainage structures that retain the original drainage patterns to protect the riparian areas along streams. Therefore, there would be very minor effects on riparian wetlands under a road construction alternative.

Effects on Vegetation—Under the selected action and the no action alternative, adverse effects from repeated routine maintenance of roadside vegetation to provide a clear and safe roadway for vehicles will be negligible. All vegetation along existing roads has been previously disturbed by road construction or logging. Under the road construction alternative, 25 acres in the park of second-growth forest would be removed to clear a 36-foot-wide corridor for the road. On GDRCo lands, 45 acres of second-growth forest would be removed to construct new roads in a 60-foot-wide corridor and 80 acres would be cleared in a 20-foot-wide corridor to upgrade roads. These impacts to vegetation are considered negligible because the vegetation is second-growth forest that is not high-quality wildlife habitat, and because second-growth forest on GDRCo lands is intended to be managed for timber values. There will be no effect on old growth forests or large mature trees under any of the alternatives including no action.

Cumulative Effects on Vegetation—Cumulative effects on vegetation in the parks and the surrounding region are related to logging and associated road construction, and residential, commercial, industrial, agricultural, and transportation development and use. The most significant cumulative effect on vegetation in RNSP occurred prior to park establishment and expansion from the logging of 50,000 acres of original coniferous forest, mostly in the Redwood Creek watershed. Logging has also affected much of the 25,000 acres recently acquired by CDPR in the Mill Creek watershed southeast of the project area. Park projects that affect vegetation include watershed restoration; maintenance of roads and trails; restoration of the Bald Hills grasslands and oak woodlands through removal of encroaching Douglas-fir; and control of invasive exotic plants. NPS and CDPR have implemented a program to protect Port-Orford-cedar from a root disease that is affecting this economically and ecologically valuable species along the Smith River and in the Little Bald Hills area of the parks. Sudden Oak Death, caused by a pathogen closely related to the root disease agent, is also expected to adversely affect park vegetation but the degree of effect is not yet known.

Timber production is the principal land use within GDRCo ownership. The timberlands owned by GDRCo within the assessment areas will continue under intensive forest management. These activities will include timber harvesting, minor road construction and reconstruction, reforestation, stand improvement, and wildlife management, as well as a GDRCo watershed restoration projects throughout the GDRCo ownership. GDRCo plans to conduct harvest operations on approximately 1,954 acres east of the Bald Hills in

the Klamath drainage through the year 2016, with 282 acres selectively logged and 1,672 acres scheduled for clearcutting. The timing or location of future timber harvests where on-the-ground field and layout work has not begun is not reasonably foreseeable due to the uncertainty that accompanies GDRCo's harvest planning process. This uncertainty is due to the interaction of a variety of factors including the constraints imposed by management of biological resources within the harvest area, the regulations governing timber harvesting in California, and fluctuations in wood products markets that are associated with a host of unpredictable economic factors.

Effects on Wildlife—There will be temporary adverse effects on wildlife from noise and vegetation disturbance within the road corridor for road maintenance under no action and the selected action; these effects are negligible because the roads are in regular use and the quality of the habitat is diminished by the existence of the road. Road construction under Alternative 3 would have adverse effects on wildlife from noise during construction, and would reduce the amount of habitat in the park by 25 acres and on adjacent GDRCo lands by 125 acres. The adverse effect of loss of habitat on wildlife populations from construction of additional roads would be negligible because there is sufficient adjacent land to sustain the wildlife populations that are able to survive in logged forests.

Cumulative Effects on Wildlife—The logging that occurred in the project area prior to park establishment and expansion had significant adverse effects on certain terrestrial and aquatic species of wildlife. Some species that suffered major population declines from loss of forest habitat due to logging throughout their range were listed as threatened under the federal or California endangered species acts; effects on these species are discussed under *Effects on Threatened and Endangered Species.* The effects on terrestrial wildlife from clearcut logging in what is now the park were localized on individual animals but widespread throughout timber harvest areas, and were generally adverse from loss of vegetation used for shelter and food over the short-term. Wildlife populations of most species are recovering as forests regrow.

Effects on Rare, Sensitive, Threatened, and Endangered Species—Use and maintenance of existing roads located on ridgelines and that do not cross perennial streams will not affect rare plants or threatened fish species. Use and maintenance of existing roads will cause occasional noise and disturbance within the existing road corridor. Road maintenance that has the potential to affect listed species will be conducted in compliance with terms and conditions or BMPs found in Biological Opinions issued by USFWS and NMFS to avoid or reduce adverse effects on listed wildlife or fish species, and their designated critical habitat.

Routine road maintenance on all park roads will have negligible adverse effects on listed aquatic species from brushing and grading. Short-term adverse effects from increased erosion at stream crossings for replacement of culverts along main haul roads will be reduced by implementation of best management practices described in the NPS biological assessment for Annual and Periodic Road Maintenance, and the resulting biological opinion and letter of concurrence issued by NMFS in 2003 (file number 151422SWR02AR6347) with the 2006 addendum.

Cumulative Effects on Rare, Sensitive, Threatened, and Endangered Species—Many activities in Redwood National Park affect sensitive species because forests and streams are occupied by bird species (northern spotted owls, marbled murrelets) and anadromous fish (coho and chinook salmon, steelhead trout) that are federally listed as threatened. On-going and planned projects and activities for which the NPS consults with either USFWS or NMFS for potential effects on listed, proposed, and candidate species include watershed and second-growth forest restoration; road, trail and facility maintenance and construction; non-native plant management; helicopter and off-road vehicle use; and beach management. The NPS has been authorized incidental take of listed species, primarily northern spotted owls, marbled murrelets, and anadromous salmonids, by the USFWS and/or NMFS for some of these activities. On-going NPS actions do not jeopardize the continued survival of any listed or proposed threatened or endangered species. Fire management throughout the parks will have minor long-term benefits to sensitive species from reduction in fuel levels that reduce the potential for catastrophic wildfires. Management of second growth forests in RNSP will have minor to moderate benefits as forests recover characteristics more typical of old growth forest and habitat for forest-dwelling bird species improves.

Using the guidelines outlined in the current and previous biological assessments and terms and conditions specified in associated biological opinions, cumulative adverse effects to anadromous fish or their habitat are expected to be minor and short-term. There will continue to be long-term adverse effects on fish as untreated roads fail and sediment is delivered to streams. These adverse effects range from minor to moderate depending on the volume of sediment delivered and the distance between the erosion site and stream. Long-term benefits to listed fish are expected from the reduction of threats associated with erosion and sedimentation of streams resulting from failure of untreated roads and stream crossings, and from restoration of drainage patterns and geomorphic processes under watershed restoration projects.

Outside the parks, the primary activities that affect sensitive or listed threatened and endangered species are loss of habitat from logging, residential, industrial, and agricultural development; dams for power development, flood control, and water supply for domestic and agricultural activities; and residential, commercial, industrial, agricultural, and recreational development projects that reduce the quality of habitat or decrease the quantity of habitat. For anadromous fish, sport and commercial fishing also affect fish populations over both the short- and long-term. The cumulative effects on some species and their habitat are widespread, adverse, long-term, and significant, and have resulted in the listing of these species as threatened.

The GDRCo conservation strategy for protecting northern spotted owls is based on the 1992 HCP that sets aside 13,200 acres of no harvest area, maintains a 20,000-acre special management area, and accelerates the regrowth of owl habitat. Under an amendment to the northern spotted owl HCP, GDRCo has initiate research on the interaction between the northern spotted owl and the barred owl; the NPS is a partner in this research. GDRCo has been authorized incidental take of northern spotted owls by USFWS under Section 10(a) of the Endangered Species Act.

Coho and Chinook salmon and steelhead are not directly affected by timber harvest on GDRCo lands within the project area. Protection provided by the FPRs and site-specific mitigations required for THPs will reduce effects on these species to less than significant, as required under CEQA and the California Endangered Species Act.

GDRCo has a federally-approved AHCP for six aquatic species. The AHCP includes required mitigation measures and terms and conditions for operations to avoid or reduce adverse effects on federally listed threatened and endangered species. The conservation strategy for protecting aquatic species includes, among other things, protective measures for unstable areas and streamside harvesting, and road improvement schedules for its entire ownership. The Final Environmental Impact Statement for the AHCP was approved and signed on June 12, 2007. The incidental take and enhancement of survival permits issued by the USFWS and NMFS under Section 10(a) of the Endangered Species Act became effective on July 1, 2007.

Effects on Cultural Resources—No historic resources listed or eligible for listing on the National Register of Historic Places will be adversely affected by the selected action. Densely forested lands within the park and in GDRCo ownership that were harvested for timber are considered to have low cultural sensitivity for archeological resources, ethnographic resources or historical resources. Sensitive cultural areas are generally associated with ridges that served as trail routes, open prairies, oak woodlands, streams and especially the mouths of Redwood Creek and the Klamath River because these areas were more easily accessible by foot, boat, or horseback, and because the primary food sources such as acorns, shellfish, salmon, and elk were found in these areas. Under the terminology of Section 106 of the National Historic Preservation Act, no adverse affect to historic properties determined eligible for or listed on the National Register of Historic Places is expected from the selected action or the no action alternative.

Since Alternative 3 would result in new road construction in archeologically sensitive areas, this alternative could contribute to cumulative adverse effects on cultural resources.

Cumulative Effects on Cultural Resources— Adverse effects on cultural resources in the park occurred with prior timber harvesting and ranching; construction of roads, industrial, commercial, and residential development; and agricultural development. Some of these developments that retained their original integrity have been determined eligible for listing on the National Register of Historic Places.

Other on-going and proposed activities in the parks include fire management, watershed restoration, management of second growth forests and non-native plants, and maintenance and construction of trails and other facilities. Cultural sensitivity of the coniferous forest where watershed restoration and second growth forest management occur is very low since these areas were logged or affected by road construction, which very likely damaged or destroyed any cultural resources originally present. Invasive non-native plants occur primarily in areas affected by recent human disturbance. Cultural resources in these areas are protected by avoiding or minimizing ground disturbance.

Cultural resources on GDRCo land are addressed through a records check and survey prior to any CEQA- approved activity.

Effects on Visitor Experience and Visual Quality— There would be no effect on park visitors from GDRCo use of park roads under the selected action or the no action alternative because these roads are closed to visitor use. There will continue to be negligible to minor adverse effects on the soundscape in the vicinity of old growth forest along portions of the Bald Hills Road between Holter Ridge and Lady Bird Johnson Grove from logging truck traffic. Some of this traffic originates from roads that are not part of the ROW conveyance. Roads providing access to the park and throughout the region are commonly used for the transportation of forest products including logs and lumber.

Timber harvest is a common land use practice in the Pacific Northwest, and areas of active logging and timber of various age classes are readily visible from roads and highways. State regulations require that, "Special consideration for aesthetic enjoyment shall be given to selection of silviculture treatments and timber operations within 200 feet of the edge of the traveled surface of any permanent road maintained by the County, or the State." Regulations also require that timber harvest operations be compatible with the objective for which a special area, such as a national park, was established.

Roads that would be constructed or rebuilt under Alternative 3 would not affect visitors because the roads would not be open to public use. The effect on visitors from logging traffic on the Bald Hills Road would be the same as under the selected action or the no action alternative.

Cumulative Effects on Visitor Experience and Visual Quality—Visitors will not be affected by logging traffic or park administrative traffic under any of the alternatives because the roads considered in the ROW exchange are closed to public use. Traffic on the Bald Hills Road associated with logging will vary depending on the season and weather, and the amount of timber harvest activity in the area, which is determined by economic factors outside the influence of the NPS or GDRCo.

Areas of timber harvest will continue to be visible from public and park roads. The visual effects will be minimized by requirements in the logging regulations.

Effects on Park Operations and Adjacent Communities— There will be no adverse effects to park operations under the selected action or the no action alternative, because NPS will use GDRCo's existing roads, and the NPS will not construct, reconstruct or upgrade roads on park lands. There would be adverse effects on park operations under Alternative 3 if the NPS had to build a new road system to access park lands on the west side of Redwood Creek. The adverse effect could be minor to moderate and short-term to long-term depending on whether new funds became available for construction of the new road system. Increased maintenance costs would be a moderate long-term adverse effect as maintenance costs increase.

Conclusion—As summarized above, the effects of the selected action have been considered and determined to be less than significant both individually and in combination with the cumulative effects from road use and maintenance of existing roads. These effects have also been considered under the criteria for significance listed in the Council on Environmental Quality regulations (40 CFR 1508.27) and found to be less than significant.

Actions for which mitigation can be prescribed, the prescribed mitigation, and the responsible party are summarized in the following table:

Summary of Effects and Mitigation for the Redwood National Park Green Diamond Resource Company Rights-of-Way Exchange

Resource & Effect	*Mitigation*	*Responsible Party*
Air Quality: negligible localized short term adverse effects from dust and vehicle emissions	Water trucks for dust abatement on GDRCo lands; vehicle emissions regulated to state standards	GDRCo–dust control & vehicle maintenance; NPS–park vehicle maintenance
Soils: negligible long-term adverse effects from grading previously disturbed soils on 23.2 miles of existing roads	Implement BMPs and standard erosion control measures to reduce erosion and run-off within existing road corridors	GDRCo–implement BMPs & erosion control
Hydrology & Water Quality: negligible effects from run-off of roads; minor short-term localized adverse effects from replacement or repair of drainage structure, especially stream crossings	Implement BMPs to minimize run-off; improve existing drainage structures and stream crossings; roads and drainage structures maintained to high standards	GDRCo–implement BMPs and erosion control
Floodplains & Wetlands: no direct effects on floodplains; minor short-term localized adverse effects to riparian wetlands from stream crossing repairs and improvements	Minimize area of riparian wetland affected during repairs or improvements to drainage structures and stream crossings	GDRCo– implement BMPs and erosion control
Vegetation: negligible adverse effects to second growth forests in road corridors from removal	Vegetation removal limited to overhanging branches and brushing along edges of road corridor	GDRCo–maintain road corridor in compliance with conditions in ROW easement

Resource & Effect	*Mitigation*	*Responsible Party*
of overhanging branches and brushing along edges		
Wildlife: negligible localized adverse effect from noise from road use and maintenance	No mitigation prescribed for negligible effects to wildlife along existing road corridors	No mitigation responsibilities for either GDRCo or NPS
Sensitive Species: no effects on rare plants or listed bird species; adverse effects on listed fish from erosion and run-off from existing roads and stream crossings are indirect and negligible; short-term adverse effects from erosion when stream crossings are repaired	Protect fish by implementing BMPs to minimize run-off; improving existing drainage structures and stream crossings; maintaining roads and drainage structures to high standards	GDRCo–implement BMPs and erosion control to minimize indirect effects on listed fish during repair of stream crossings
Cultural Resources: no National Register-eligible or other known cultural resources affected	No mitigation prescribed for use and maintenance within existing disturbed road corridor	No mitigation responsibilities for no effect
Visual Quality and Visitor Experience: no effects on visual quality in park; indirect effect on visitors from logging traffic on county road through park	No direct effect on visitors from selected action	No mitigation responsibilities for no effect
Park Operations and Adjacent Communities: no effect on adjacent communities; efficiency of park operations improved from minimizing mileage driven for access to park land	No mitigation needed	No mitigation responsibilities for no effect

Non-Impairment of Park Resources and Values

Non-Impairment of Air Quality—There will be negligible short-term localized adverse effects on air quality from dust and vehicle emissions under both the selected action and

the no action alternative. Vehicle emissions must comply with state and federal emission standards. Air quality in the parks will return to good to excellent condition after vehicles pass through an area. There will be no long-term effect on visibility or other air quality related values in the park from use of the roads. Construction of new roads under Alternative 3 would generate dust but long-term effects from use and maintenance would be the same as under the selected action.

Therefore, air quality and air quality related values in the park will not be impaired under the selected action, the no action alternative, or Alternative 3.

The adverse impacts to air quality and air-quality related values in the park under the selected action and the no action alternative are limited to vehicle emissions and dust from vehicles using unpaved roads during the dry season. Construction, use and maintenance of roads under Alternative 3 would generate dust but the long-term adverse effect on air quality would be negligible. Long-term impacts are localized and negligible and are therefore acceptable.

Non-Impairment of Soils or Geological Resources—No geological resources will be affected by the selected action or the other alternatives. There are no known geological hazards. All soils have been previously affected by logging, original road construction or agricultural use. Earthmoving required to construct roads under Alternative 3 would redisturb soils already affected by logging and road construction. The original impairment to soils from poorly regulated logging and road construction would not be worsened under the selected action, the no action alternative or the road construction.

Therefore, neither the selected action, the no action alternative, nor Alternative 3 will cause additional impairment to soils or geological resources in the parks nor increase geological hazards that might cause impairment to park resources.

Non-Impairment of Hydrology and Water Quality—Under the no action alternative and the proposed action, existing roads will be used and maintained. Use and maintenance of existing roads located near and on top of ridges will not affect hydrology and will result in negligible erosion of road surfaces and therefore negligible effects on water quality. Water quality and hydrology will be protected by maintenance of roads and stream crossings and use of adequate drainage for roads. Use and maintenance of existing roads will not contribute to the sediment impaired or temperature impaired condition of Redwood Creek, using the definition of impairment from Section 303 (d) of the Clean Water Act. Watershed restoration that removes roads within the park will reduce potential road failures that contribute to erosion and sedimentation that eventually will reach Redwood Creek and cause adverse effects on water quality. Therefore, the selected action and the no action alternative will not create additional impairment to the hydrology and water quality of park streams that resulted from past logging and road construction, and will reduce any potential for future impairment by using and improving the maintenance of existing roads.

New roads constructed under Alternative 3 would increase the mileage of roads within and adjacent to the project area. Roads would be constructed to modern standards with

adequate drainage structures and receive regular maintenance. The construction of 2.5 miles and rebuilding of 3.6 miles of additional roads in the watershed and the potential for failure with resulting adverse effects on water quality would not create an impairment in the park especially in comparison to the existing impaired condition, but the existing impairment would not be reduced, and the hillslope targets of fewer roads established in the Redwood Creek TMDL to reduce the level of sediment impairment in Redwood Creek would not be met.

Under the no action alternative and the proposed action, the impacts on hydrology and water quality from use of the existing roads are considered acceptable, because

- the roads would be maintained at a standard to prevent adverse effects to these resources or values;
- the roads have been determined by park geologists to have no potential for long-term adverse effects to hydrology and water quality, and therefore, are not subject to removal under the park watershed restoration program.

Under Alternative 3, the effects on hydrology and water quality from re-opening park roads that were previously removed would be minor. Even though new roads would be constructed to modern standards, construction of new administrative roads in the park and rebuilding roads previously removed by the park's watershed restoration program are inconsistent with management strategies for watershed restoration outlined in the 1999 GMP/EIS and with the establishing legislation for the park which directed the NPS to implement the watershed restoration program to reduce sedimentation associated with past land use practices of logging and road construction. Construction of new roads within the park would not meet the Redwood Creek TMDL hillslope targets established by the EPA to reduce the sediment impairment of water quality in Redwood Creek. Constructing new roads would impede the attainment of the park's desired future condition for hydrology as identified in the 1999 GMP/EIS. Constructing new roads on GDRCo land would also be unacceptable because the NPS is actively engaged in a cooperative program with GDRCo, and other adjacent landowners, to reduce the adverse effects on park and regional resources from construction and use of roads. Therefore, impacts on hydrology and water quality from construction or re-opening of roads would be an unacceptable impact, even though these impacts would be minor.

Non-Impairment of Floodplains and Riparian Wetlands— There will be negligible direct or indirect adverse effects on floodplains or wetlands under the selected action and the no action alternative because the existing roads are on ridges high in the drainages above the floodplains of the Klamath River or Redwood Creek; none of the park roads cross intermittent or perennial streams in the project area with associated riparian wetlands; and because existing roads are maintained in a condition to ensure adequate drainage to protect natural wetland functions associated with riparian zones. The floodplain of Redwood Creek will remain impaired by past land uses that caused stream aggradation. Current management of GDRCo and NPS lands will continue to lessen the impairment through voluntary efforts to meet hillslope targets established in the Redwood Creek TMDL. Riparian wetlands in tributary streams and along the mainstem of Redwood Creek will continue to improve as the adverse effects of past land uses are lessened through the watershed restoration program and efforts to reduce erosion from roads.

Therefore, floodplain and wetland values in the national park will not be impaired under the selected action or the no action alternative.

Under Alternative 3, new roads would be constructed and maintained to modern standards to prevent road and slope failures that adversely affect floodplains and wetlands by scouring or aggrading stream channels and removing riparian vegetation. The road to be constructed in the national park would be located high in the drainage, and would not affect the floodplain of Redwood Creek. About 2.1 acres of non-contiguous riparian wetlands that are common in the park and that were already disturbed by prior logging, road building, and road removal would be affected. Therefore, there would be no new impairment to floodplains or wetlands from construction of a new road but the impairment to the floodplain of Redwood Creek from the previous road network would not be lessened.

Under the no action alternative and the proposed action, the impacts on floodplains and riparian wetlands from use of the existing roads are considered acceptable, because

- new impacts to the Redwood Creek floodplain will be indirect and negligible because roads will are located high above the creek;
- riparian wetlands in the park will not be affected by use of existing roads, which are not located next to riparian corridors;
- the roads will be maintained at a high standard to prevent road failure and associated adverse effects to floodplains and riparian wetlands;
- the roads have been determined by park geologists to have no potential for long-term adverse effects to aquatic resources including floodplains and riparian wetlands and therefore, are not subject to removal under the park watershed restoration program.

Under Alternative 3, the effects on the Redwood Creek floodplain from re-opening park roads that were previously removed would be negligible and indirect. The effects on riparian wetlands from re-opening park roads would be direct and minor. Construction of new roads within the park for administrative access and rebuilding roads that were previously removed under the park's watershed restoration program are inconsistent with management strategies outlined in the 1999 GMP for watershed restoration, with the management zoning established in the 1999 GMP, and with the establishing legislation for the park which directed the NPS to implement the watershed restoration program to reduce sedimentation associated with past land use practices of logging and road construction. Constructing new roads would impede the attainment of the park's desired future condition for riparian wetlands as identified in the 2000 GMP. Constructing new roads on GDRCo land would also be unacceptable because the NPS is actively engaged in a cooperative program with GDRCo, and other adjacent landowners, to reduce the adverse effects on park and regional resources from construction and use of roads. Therefore, impacts on riparian wetlands from construction or re-opening of roads would be a long-term adverse impact that is determined to be unacceptable.

Non-Impairment of Vegetation Resources— The impairment to park vegetation communities caused by logging prior to park establishment is lessening as forests regrow. Impairment to old growth forests caused by clearcutting can only be reduced through

centuries of regrowth. The impairment to logged forests will be reduced more quickly by management of some logged forest stands to accelerate the recovery of old growth characteristics. Under the no action alternative and the selected action, there will be no new disturbance to vegetation in the park from use and maintenance of existing roads. All vegetation along all roads covered under the ROW agreement has been previously disturbed by logging and road construction. Therefore, there will be no impairment to park vegetation resources from the selected action or the no action alternative or from building a new road system under the road construction alternative. Under the road construction alternative, a road would be constructed through previously harvested second-growth forest similar to what would be thinned under the proposed second-growth forest management program, and, therefore, the effects on 25 acres of previously logged forests under Alternative 3 would not create additional impairment to park vegetation resources.

Under all alternatives including no action, maintaining the existing road corridors through periodic removal of overgrown and overhanging vegetation to provide a clear and safe roadway for vehicles and removal of 25 acres of second-growth forest in the park to construct new roads or re-open roads are acceptable impacts on park vegetation resources and values.

Non-Impairment of Wildlife Resources— Use of existing roads under the no action alternative and the selected action will continue to have temporary adverse effects on some species of wildlife that are less tolerant of human presence and noise disturbance. The primary adverse effect on wildlife populations in the park resulted from the loss of habitat from the original logging that occurred over 40 years ago, prior to park establishment. Road construction would remove about 25 acres of park forest that has regrown following the original timber harvesting. Removal of 25 acres of second-growth would have a negligible effect on wildlife because there are approximately 50,000 acres of previously harvested forests in the park and much of this habitat is not high quality habitat. The continued use and maintenance of roads or the rebuilding, upgrading or new construction of roads will not have any new long-term adverse effects on park wildlife, and, therefore, wildlife resources in the park will not be impaired under any of the alternatives.

The repeated, short-term impacts on wildlife from use and maintenance of existing roads under the no action alternative and the selected action will be negligible and therefore are acceptable. Under the road construction alternative, the impacts from noise, disturbance and loss of 25 acres of low-quality habitat from construction would be negligible, and therefore, have been determined to be acceptable.

Non-Impairment of Rare, Sensitive, Threatened, and Endangered Species— Use and maintenance of existing roads under the selected action and the no action alternative would cause occasional noise. Existing roads covered in the ROW exchange that pass through second growth forests do not adversely affect listed species. The roads are located on ridges or high in drainages that do not contain perennial streams and therefore do not support listed fish species. Indirect impacts on listed threatened fish species from culvert replacements on existing roads would be minimized through best management

practices and terms and conditions in NMFS biological opinion for periodic and annual road maintenance (NMFS biological opinion and letter of concurrence 151422SWR02AR6347, March 2003). Therefore, use and maintenance of these roads under the selected action or the no action alternative will not create an impairment to threatened or endangered species in the park.

Constructing, upgrading, or rebuilding roads in or outside the parks under Alternative 3 would occur in second-growth forest on previously logged lands. There would be no effects on marbled murrelets from construction in second-growth forest. Potential adverse effects on northern spotted owls from removal of 25 acres of second-growth forest in the park suitable for foraging would be minor because of the quantity of similar habitat throughout the park. None of the roads to be constructed would be near streams, except at stream crossings. Stream crossings would be located high in drainages above perennial stream reaches. Roads would be constructed using best management practices to avoid indirect effects to listed fish species in streams downslope of the project area. Therefore, the road construction alternative would not create an impairment to threatened or endangered species in the park.

High maintenance standards and best management practices to control erosion avoid or minimize adverse effects to listed fish species under all alternatives, including the selected action. Roads to be constructed or re-opened under Alternative 3 would be located in second growth forest and would cross stream reaches that are not occupied by listed fish. Indirect impacts on listed fish from construction of new stream crossings would be minimized by best management practices and terms and conditions in biological opinions that would be required for such construction in the park, or that have been issued to GDRCo through the planning process for the approved HCP/AHCP. These impacts would be negligible and have been determined to be acceptable.

Non-Impairment of Cultural Resources—Existing roads traverse areas that have been affected by logging and original road building. Any prehistoric archeological sites within road corridors or logged areas have been affected by ground disturbance. Use and maintenance of existing roads in existing disturbance corridors will not affect significant cultural resources. Therefore, no significant cultural resources will be impaired by the selected action or under the no action alternative.

There will be no impacts to significant cultural resources from use or maintenance of existing roads, nor are impacts to cultural resources anticipated from construction or re-opening of any of the roads. Therefore, none of the alternatives will have unacceptable impacts on cultural resources.

Non-impairment of Visual Quality and Opportunities for Visitors to Enjoy Park Resources–There would be no new effects on soundscapes under any of the alternatives. The current soundscape in the vicinity of the Bald Hills Road is affected by traffic on the public road but the effect is temporary as traffic passes. The soundscape of this portion of the park would not be impaired under any of the alternatives, including the selected action.

All existing roads that are covered in the right-of-way exchange pass through previously logged areas that are considered to be of lower visual quality than the old growth forest in unlogged park lands and that are not open to the public. Roads that would be constructed would be located in or adjacent to second growth forest in the park in areas that are not open to visitor use. Noise from use of existing roads off the Bald Hills Road would be at the same duration and intensity of the noise generated by the same vehicles using the Bald Hills Road. Noise from use of other roads is generated in areas not open to park visitors or areas immediately adjacent to GDRCo lands on which timber harvest is permitted. These impacts on visual quality and the soundscape are judged to be acceptable.

Conclusion

Based on the environmental assessment analysis of issues and alternatives, together with due consideration of public interest and the relation between public interest and laws, statutes, and regulations for managing NPS units, the capability of the mitigation measures to ameliorate any potential impacts, and the concurrence of agencies and affiliated American Indian tribes that were consulted, the NPS will implement Alternative 2 as presented in the *Redwood National Park and Green Diamond Resource Company Rights-of-Way Exchange Environmental Assessment*, dated October 2008. It is the determination of the NPS that exchanging rights-of-way with Green Diamond Resource Company does not constitute a major federal action significantly affecting the quality of the human environment, nor is this project without precedent or similar to ones that normally require an environmental impact statement. These uses of the site are appropriate. This alternative was deemed to be the environmentally preferred course of action; there are no unacceptable impacts nor will any impairment to park resources occur. Therefore, in compliance with the National Environmental Policy Act, the NPS will not prepare an EIS, and the NPS and Green Diamond Resource Company will proceed to implement the selected action as soon as practicable.

Recommended: Steve W. Chaney 12.02.2008

Steve W. Chaney, Superintendent — Date
Redwood National Park

Approved: 12/9/08

Jonathan B. Jarvis, Director — Date
Pacific West Region
National Park Service